

Court Original

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IN THE UNITED STATES District Court For THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED

JEFFERY PAUL MOSER
vs.

MAY 31 2001

KENNETH KYLER ET. AL.

PER

HARRISBURG, PA.

CIVIL NO. 1:00-cv-01846

JUDGE: William Caldwell

DEPUTY CLERK

* PLAINTIFF REQUEST COURTS PERMISSION TO FILE A "TRAVERSE", *
 UNDER RULE (8) OF FED. R. CIV. P., TO CORRECTIONS DEFENDANT(S)
 RESPONSE TO PLAINTIFF "MOTION TO RECONSIDER APPOINTMENT OF COUNSEL".

WHEREFORE I, JEFFERY MOSER (Plaintiff) REQUEST PERMISSION FROM THE HONORABLE COURT TO FILE A "TRAVERSE" IN RESPONSE TO CORRECTIONS COUNSEL RESPONSE IN THE ABOVE MENTIONED MATTER (SHAWN P. KENNY ESQ / CORRECTIONS COUNSEL) ("FOR REASON OF SPECIAL CIRCUMSTANCES") AS FOLLOWS:

1.) PLAINTIFF BELIEVES IN THE CORRECTIONS COUNSEL PLEA TO HAVE THIS ACTION "DISMISSED", COUNSEL (MR. KENNY) HAS BEEN "LESS THAN" TOTALLY HONEST IN HIS PLEA WITH THE HONORABLE COURT AND/OR AT MINIMAL VERY MANIPULATIVE IN NOT TELLING THE "WHOLE TRUTH" ON SEVERAL ISSUE'S.

But most recent Esq. Kenny stated in the above mention document "Moser is receiving treatment" He just doesn't like it" trying to imply to the Honorble Court, this is the case (truth) present and always has been the case (truth). Plaintiff will not go further into this now, as the court must grant permission, before Plaintiff is permitted to do so.

2.) PLAINTIFF, BELIEVES THIS INFORMATION TO BE LEADERSLY "FALSE AND NOT TRUE" .

3.) PLAINTIFF, BELIEVES IT WOULD BE A "MESCARRIAGE OF JUSTICE" FOR THE HONORABLE COURT TO ACT ON AND/OR DISMISS THE PLAINTIFF ACTION "WITHOUT LOOKING AT THE WHOLE PICTURE (OR) ON THE BASES OF INFORMATION THAT MAY BE "FALSE" IN PART AND/OR IN WHOLE.

4.) THE PLAINTIFF HAS REVIEWED THE FACTS AND BELIEVES HE CAN SHOW THE HONORABLE COURT THE "FALSEHOD" OF ESQ. KENNY'S STATEMENT(S).

5.) PLAINTIFF, REQUEST INJUNCTIVE PROTECTION FROM D.O.C. DEFENDANT(S) AND COUNSEL FROM "RETALIATION" OF THIS PLEA! * PLAINTIFF RESPECTFULLY REQUEST PERMISSION TO FILE A "TRAVERSE". (RESPECTFULLY SUBMITTED)

(SIGNED TOOF 28 U.S.C. 1746)

Jeffrey Moser 5/22/01

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA...

MOSER

vs.

Kylee

CIVIL NO. 1:00-EU-1846

RE: Plaintiff Request Permission To FILE A
"TRVERSE".

* Certificate of Service *

I, JEFFREY MOSER, (Plaintiff) HEREBY CERTIFY THAT I HAVE
ON THIS 28th Day of May, 2001, SERVED A COPY OF THE BELOW-
REFERENCED DOCUMENT(S) UPON THE PERSON AND IN THE MANNER
INDICATED BELOW; (PLACED IN THE U.S. MAIL BOX A S.C.I. HUNTINGDON)

Service By First class mail as follows:

1.) Shawn P. Kenny Esq.
OFFICE OF CHIEF COUNSEL
PA. DEPT. OF CORRECTIONS (I.D. NO# 1619(1) REG# 100
55 UTLEY DRIVE
CAMP HILL, PA. 17011

2.) Peter Welsh (CLERK)
U.S. DISTRICT COURT
228 WALNUT ST.
P.O. BOX 983
HARRISBURG, PA. 17108

3.) James D. Young Esq.
P.O. BOX 1245 (109(3))
HARRISBURG, PA. 17108-1245
(mailed later after copies were provided)

Respectfully Submitted,

Jeffrey P. Moser

ON THIS 28th Day of May, 2001

JEFFREY PAUL MOSER BE4713

1100 PIKE ST

HUNTINGDON, PA. 16654-1112